

## **Advocates for Justice Chartered Attorneys**

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March 7, 2023

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Kocar v. The Port Authority of NY and NJ*, 19-cv-11508 (JLR)  
First Letter Motion for An Extension in Filing Deadlines

Dear Judge Rochon:

We write jointly to request a two-week extension in the motion and pretrial preparation schedule in this action. This is the parties' first request for an extension in these deadlines.

The Court order that by March 17, 2023, the parties were to submit any motions in limine. Oppositions to motions in limine were to be submitted by March 24, 2023. Further, by March 17, 2023, the parties were to submit all required pretrial filings, including their proposed joint pretrial order, requests to charge, verdict form, voir dire questions, documentary exhibits and demonstratives, and all other required submissions in accordance with Rule 5 of the Court's Individual Rules of Practice. *See* Dkt. 56.

The parties propose a two-week extension in the foregoing deadlines as follows: The motions in limine if any shall be filed on or before March 31, 2023 along with all pretrial filings as required by the Court's Individual Practice Rules. Oppositions to motions in limine shall be filed on or before April 17, 2023.

The reasons for this extension is due in part to the departure of Plaintiff counsel's executive director, causing Plaintiff's counsel to have to take on the ED's work responsibilities, which in effect doubled her own workload.

We would appreciate your consideration in this request.

Respectfully yours.

ADVOCATES FOR JUSTICE  
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*Attorney for Defendant*  
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Request **GRANTED**. The deadline to submit all required pretrial submissions and motions in limine is extended to **March 31, 2023**. Opposition to any motions in limine are due by **April 17, 2023**.

Dated: March 7, 2023  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
**United States District Judge**